

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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MARJORIE JOAN DONAHOE,

Plaintiff

V.

MAGGIANO'S HOLDING
CORPORATION, D/B/A MAGGIANO'S
LITTLE ITALY RESTAURANT,

Defendant

CIVIL ACTION NO.
1:18-cv-10230-DPW

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**AMENDED COMPLAINT
AND DEMAND FOR SPEEDY JURY TRIAL**

1. The Plaintiff, Marjorie Joan Donahoe, is a seventy-nine year-old resident of Mashpee, Barnstable County, Commonwealth of Massachusetts.

2. The Defendant, Maggiano's Holding Corporation, is a duly-constituted corporation with places of business throughout Massachusetts, including Suffolk County.

3. At all times material hereto, the Defendant, Maggiano's Holding Corporation, owned and/or managed the premises known as Maggiano's Little Italy Restaurant located at Four Columbus Avenue in Boston, Suffolk County, Commonwealth of Massachusetts.

4. On December 19, 2014, the Plaintiff was lawfully on the premises at Maggiano's Little Italy Restaurant. When she exited the premises through its revolving door, she was unexpectedly thrown forward when the door accelerated, causing her to land on the sidewalk outside, thereby sustaining serious injury.

5. This revolving door was owned, designed, utilized, maintained and/or controlled by the Defendant, and constituted a hazardous condition on its premises with regard to the Plaintiff's path of egress.

6. The Defendant was thereby negligent with respect to this hazardous revolving door which caused the Plaintiff to suffer great pain of body and mind, to endure hospitalization, to incur expenses for medical attention and prevent her from engaging in the normal activities of daily living.

WHEREFORE, the Plaintiff, Marjorie Joan Donahoe, demands judgment against the Defendant, Maggiano's Holding Corporation, in an amount that is fair, together with interest and costs and such other relief to which she is legally entitled.

THE PLAINTIFF DEMANDS A SPEEDY TRIAL BY JURY.

Respectfully submitted,

MARJORIE JOAN DONAHOE,
By her attorneys,

/s/ Paul F. Kenney

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